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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DIONISIE RAZVAN SPOREA and
SKAI NICOLE PEED-SPOREA,

Plaintiffs,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

2:19-cv-1383-GMN-DJA

STIPULATION AND ORDER FOR STAY
OF PROCEEDINGS PENDING AGENCY
DECISION

Each of the parties to this action, through their respective counsel, stipulate and agree as follows:

1. This is an action under the Administrative Procedure Act seeking judicial review of an immigration-related agency decision issued by the United States Citizenship and immigration Services (USCIS) in May 2019.

2. The May 2019 USCIS decision denied plaintiff Dionisie Sporea's application for adjustment of status (form I-485) based on USCIS's determination that Dionisie Sporea had entered the United States as a "crewman" and was thus ineligible for adjustment of status to lawful permanent resident.

1 2. USCIS has vacated its May 2019 decision denying plaintiff Dionisie Sporea's application
2 for adjustment of status (form I-485) and will reopen the administrative proceeding regarding the
3 application.

4 3. The re-opened administrative proceeding will include USCIS's interview of applicant
5 Dionisie Sporea regarding his application for adjustment of status, further development of the
6 Administrative Record pertaining to the application with materials and information relevant thereto,
7 and USCIS's reconsideration of Dionisie Sporea's application for adjustment of status (form I-485) to
8 lawful permanent resident .

9 3. USCIS expects to schedule and conduct an interview of Dionisie Sporea within 60 days
10 following the Court's approval of the within stipulation and will use its best efforts to do so.

11 4. USCIS expects to issue a decision to grant Dionisie Sporea's re-opened application for
12 adjustment of status or, alternatively, issue a Notice of Intent to Deny (NOID) the application within
13 60 days following the interview of Dionisie Sporea and will use its best efforts to do so. In the event a
14 NOID is issued, plaintiff Sporea will be provided an opportunity to respond to the NOID with
15 additional information and/or materials and USCIS will thereafter issue its final decision within 60
16 days of USCIS's receipt of Sporea's response.

17 5. Based on the foregoing, the parties jointly request that this civil action be stayed until
18 February 19, 2021 in order to provide time for USCIS to schedule and conduct an interview of
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1 Dionisie Sporea and to reconsider his eligibility for adjustment of status to lawful permanent resident.

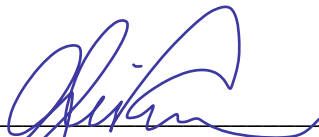
2 The parties propose to file a status report no later than February 12, 2021.

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4 /s/ Anna Darbinian
ANNA DARBINIAN, ESQ,
5 Counsel for Plaintiffs

/s/ Greg Addington
GREG ADDINGTON
6 Assistant United States Attorney

7 Based on the foregoing stipulation and good cause appearing therefor, IT IS HEREBY
ORDERED that this action is STAYED until February 19, 2021. The parties shall file a joint status
8 report no later than February 12, 2021.

9 Dated this 14 day of October, 2020

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Gloria M. Navarro, District Judge
13 United States District Court
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